

Programmatic Approach to Air Quality Management in the Salton Sea Ecosystem Restoration Study and PEIR

March 14, 2006

Goals of the Legislation

- California Resources Agency to prepare an Ecosystem Restoration Study (ERS), Programmatic Environmental Impact Report (PEIR), and Financing Plan.
- Secretary of Resources to select the alternative that to the maximum extent feasible “eliminates air quality impacts associated with the restoration” (and best meets habitat and water quality goals).
- Resources Agency to collaborate with the state and local air quality agencies.

IID Water Transfer FEIS/FEIR

PEIR alternatives all must include implementation of the mitigation and monitoring requirements of the IID Water Transfer FEIS/FEIR – the 4 Step Plan:

- (1) restrict access
- (2) conduct research and monitoring
- (3) if emissive, provide offsets
- (4) if insufficient offsets, implement feasible dust mitigation measures.

BACM and Regulations

As serious PM10 nonattainment areas, SCAQMD and ICAPCD must require implementation of Best Available Control Measures (BACM) to limit emissions from significant sources under their jurisdiction.

BACM and Regulations, continued

ICAPCD (Imperial County) has adopted Rule 804 to control windblown dust from disturbed open areas. Responsible party must implement BACM to provide conditions of a Stabilized Surface at all times (ball drop test) and limit visible dust emissions (VDE) to 20% opacity.

- **Control Measures for Disturbed Open Areas (BACM listed in Rules)**
 - Apply water or dust suppressants to all unvegetated areas
 - Establish vegetation on all previously disturbed areas
 - Pave, apply and maintain gravel, or apply and maintain chemical stabilizers
- **Require approved fugitive dust control plan**
- **Recordkeeping to document compliance**

BACM and Regulations, continued

SCAQMD (Riverside County) has adopted Rule 403 to control fugitive dust from anthropogenic (man-made) fugitive dust sources. Responsible party must implement BACM and must not allow dust to remain visible in the atmosphere beyond the property line.

- **Control Measures for Disturbed Areas (BACM Tables, Rule 403)**
 - water twice per day, OR
 - apply dust suppressants, OR
 - (if inactive) establish vegetative cover within 21 days
- **Require approved fugitive dust control plan**
- **Trained Dust Control Supervisor, on-site within 30 minutes**
- **Daily recordkeeping to document compliance**

Programmatic Environmental Impact Report (PEIR)

- The Programmatic EIR will not result in permitting or implementation of any project or alternative. Project-level environmental documentation and approvals would be required prior to implementation of any future project or alternative.
- The Programmatic EIR will not identify the responsible party, agency, or entity that would own or operate any future project, nor will it identify the source of project funding.

Risk Management in the PEIR

The Resources Agency's Programmatic EIR is based on a conservative approach, aimed to

- 1) manage risk,
- 2) allow for adaptive management, and
- 3) provide an analysis of the reasonable worst case with regard to emissions and water availability and demands.

Research, Monitoring, and Site-Specific Implementation of Mitigation

- Any site-specific dust mitigation measures would require research, monitoring, and demonstration of effectiveness over the lifetime of the project.

Letter from Imperial County Board of Supervisors – Jan.10, 2006

- “...none of the means essential to achieving full mitigation should be discarded. The Owens Valley experience has shown that shallow flooding and managed vegetation are feasible and effective methods of reducing emissions. Other potential mitigation measures, such as gravel and sand fences, have not proven as effective, and are unlikely to be sufficient to eliminate the air quality impacts at the Salton Sea. As such, it is essential that reserving adequate water for implementing these types of mitigation measures remain a part of the preferred alternative at this time...”

Use of Salt Crust

- Wetting with brine (enhanced salt crust) is one of the possible dust control measures discussed in the Resources Agency draft document, *Identify and Outline Measures to Control Playa Emissions*, June 2005.
- This, and other dust control measures under consideration, will be discussed in the Programmatic EIR.

Other Air Quality Issues

- The PEIR will also address air quality impacts associated with construction and operation of the alternatives, as discussed at prior meetings of the Air Quality Working Group.
- This meeting will focus primarily on emissivity and dust mitigation for exposed playa.